

Marc M. Seltzer (54534)
mseltzer@susmangodfrey.com
Steven G. Sklaver (237612)
ssklaver@susmangodfrey.com
Oleg Elkhunovich (269238)
oelkhunovich@susmangodfrey.com
Krysta Kauble Pachman (280951)
kpachman@susmangodfrey.com
Nicholas N. Spear (304281)
nspear@susmangodfrey.com
SUSMAN GODFREY L.L.P.
1900 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067-6029
Telephone: (310) 789-3100
Facsimile: (310) 789-3150

James Q. Taylor-Copeland (284743)
TAYLOR-COPELAND LAW
501 W. Broadway, Suite 800
San Diego, CA 92101
james@taylorcopelandlaw.com
Telephone: (619) 400-4944
Facsimile: (619) 566-4341

Counsel for Lead Plaintiff Bradley Sostack

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In re RIPPLE LABS, INC. LITIGATION

Case No. 4:18-cv-06753-PJH (RMI)
Formerly Consolidated/Related
Case No. 4:21-cv-06518 (Closed 9-27-21)

CLASS ACTION

This Document Relates to:

All Actions

**ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

Consolidated First Amended Complaint
Filed: March 25, 2020

Pursuant to Civil Local Rule 79-5(f), Lead Plaintiff Bradley Sostack respectfully asks the Court to consider whether the following materials, filed in relation to Lead Plaintiff's motion for class certification, should be sealed. These documents have been designated as confidential by Defendants Ripple Labs, Inc., XRP II, LLC, and Bradley Garlinghouse; or the identified third parties.

Document	Party Claiming Confidentiality	Portions to Be Filed Under Seal	Basis for Sealing
Lead Plaintiff's Motion for Class Certification and Memorandum of Points and Authorities in Support Thereof	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) Chris Larsen (third party) GSR (third party) Poloniex (third party) 	Portions highlighted in yellow throughout	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Declaration of Nicholas N. Spear	<ul style="list-style-type: none"> Defendants 	Portions highlighted in yellow throughout	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 1 to the Spear Declaration (RPLI_00623257)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 2 to the Spear Declaration (RPLI_00339374)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated "Confidential" or "Highly Confidential – Attorneys' Eyes Only" pursuant to the

			Revised Stipulated Protective Order (Dkt. 143)
Exhibit 3 to the Spear Declaration (RPLI_00339208)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 4 to the Spear Declaration (RPLI_00294765)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 6 to the Spear Declaration (RPLI_00555674)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 7 to the Spear Declaration (RPLI_00160553)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 8 to the Spear Declaration (RPLI_01641423)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes

			Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 9 to the Spear Declaration (RPLI_01931261)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 10 to the Spear Declaration (RPLI_00276363)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 11 to the Spear Declaration (RPLI_00000041)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 12 to the Spear Declaration (RPLI_01030511)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 13 to the Spear Declaration (RPLI_01673352)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential

			– Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 14 to the Spear Declaration (RPLI_00177952)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 15 to the Spear Declaration (RPLI_00978159)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 16 to the Spear Declaration (RPLI_01018075)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 17 to the Spear Declaration (RPLI_01017858)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 18 to the Spear Declaration (RPLI_00327099)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or

			“Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 19 to the Spear Declaration (RPLI_00924526)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 20 to the Spear Declaration (RPLI_00753899)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 21 to the Spear Declaration (RPLI_03572534)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 22 to the Spear Declaration (RPLI_00157641)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)

Exhibit 23 to the Spear Declaration (RPLI_00380882)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 24 to the Spear Declaration (RPLI_00308325)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 25 to the Spear Declaration (RPLI_01022302)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 26 to the Spear Declaration (RPLI_00000943)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 27 to the Spear Declaration (RPLI_01371390)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated

			Protective Order (Dkt. 143)
Exhibit 28 to the Spear Declaration (RPLI_03455221)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 29 to the Spear Declaration (RPLI_01675579)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 30 to the Spear Declaration (RPLI_01169730)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 31 to the Spear Declaration (RPLI_01674718)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 32 to the Spear Declaration (RPLI_01169610)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the

			Revised Stipulated Protective Order (Dkt. 143)
Exhibit 33 to the Spear Declaration (RPLI_01169378)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 34 to the Spear Declaration (RPLI_01675072)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 35 to the Spear Declaration (RPLI_03496477)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) GSR (third party) Chris Larsen (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 36 to the Spear Declaration (RPLI_03570145)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 37 to the Spear Declaration (RPLI_03566384)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes

			Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 38 to the Spear Declaration (RPLI_03568452)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 39 to the Spear Declaration (RPLI_03565597)	<ul style="list-style-type: none"> Defendants Securities and Exchange Commission (third party) 	Entirety of the transcript	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 40 to the Spear Declaration (RPLI_03566726)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 41 to the Spear Declaration (RPLI_03564173)	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 42 to the Spear Declaration (Defendants’	<ul style="list-style-type: none"> Defendants 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential

10/31/22 Rog Resp.)			– Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 43 to the Spear Declaration (POLO_SOSTACK_00000001)	<ul style="list-style-type: none"> Defendants Poloniex (third party) 	Entirety of the document	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)
Exhibit 64 (Declaration of Cristian Gil)	<ul style="list-style-type: none"> Defendants GSR (third party) Chris Larsen (third party) 	Entirety of the declaration	Refers to material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Revised Stipulated Protective Order (Dkt. 143)

Pursuant to Civil Local Rule 79-5(f), Defendants and third parties, as the Designating Parties, bears the responsibility to establish that its designated material is sealable.

Dated: November 18, 2022

SUSMAN GODFREY L.L.P.

By /s/ Nicholas N. Spear
 Marc M. Seltzer (54534)
 Steven G. Sklaver (237612)
 Oleg Elkhunovich (269238)
 Krysta Kauble Pachman (280951)
 Nicholas N. Spear (304281)
 SUSMAN GODFREY L.L.P.
 1900 Avenue of the Stars, Suite 1400
 Los Angeles, CA 90067-6029
 Telephone: (310) 789-3100
 Facsimile: (310) 789-3150
 mseltzer@susmangodfrey.com
 ssklaver@susmangodfrey.com
 oelkhunovich@susmangodfrey.com
 kpachman@susmangodfrey.com
 nspear@susmangodfrey.com

James Q. Taylor-Copeland (284743)
 TAYLOR-COPELAND LAW
 501 W. Broadway, Suite 800

San Diego, CA 92101
james@taylorcopelandlaw.com
Telephone: (619) 400-4944
Facsimile: (619) 566-4341

Counsel for Lead Plaintiff Bradley Sostack